

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

JENNIFER SWEDA, ET AL.,

Plaintiffs,

v.

THE UNIVERSITY OF PENNSYLVANIA, ET
AL.,

Defendants.

No. 2:16-cv-4329-GEKP

I, Troy A. Doles, declare as follows:

1. I am a partner of the law firm of Schlichter Bogard & Denton, LLP, counsel for Plaintiffs in this case. I am familiar with the facts set forth below and able to testify to them.

2. I received my Bachelor of Arts from Indiana University in 1992 and my Juris Doctorate from Saint Louis University in 1996. I have been in the private practice of law for 25 years. I have been actively engaged in complex litigation, including class actions, since 1999. I have been exclusively involved in national ERISA excessive fee class actions involving 401(k) plans and other defined contribution plans since 2006.

3. I have been active in all aspects of this litigation. I am familiar with the facts set forth below and able to testify to them based on my personal knowledge or review of the records and files maintained by this firm in the regular course of its representation of Plaintiffs in this case and 401(k) cases filed by Schlichter Bogard & Denton.

4. Schlichter Bogard & Denton LLP established a website for this settlement, www.UPenn403bsettlement.com. The class notices were placed on the website on August 26, 2021. All the filings related to the settlement were placed on the website within 24 hours of when they were docketed in this case.

5. As required by the Class Action Fairness Act (“CAFA”) and §4.1.6 of the Settlement Agreement, a Notice of Proposed Settlement was caused to be served by Federal Express or Certified Return Receipt Requested First-Class mail, where applicable, to the United States Attorney General, as well as the Attorney Generals for the 50 states and the District of Columbia, the US Virgin Islands, Guam, and Puerto Rico. A copy of the Notice of Proposed Settlement, excluding exhibits, is attached hereto as Exhibit 1.

6. On September 24, 2021, Gallagher Fiduciary Advisors, LLC informed the parties that they approved the Settlement. Attached to this declaration as Exhibit 2 is a true and correct copy of the report of the Independent Fiduciary for the Settlement in *Sweda, et al. v. The University of Pennsylvania, et al* from Gallagher Fiduciary Advisors.

7. Attached to this declaration as Exhibit 3 is a true and correct copy of the revised Escrow Agreement.

8. Attached to this declaration as Exhibit 4 is a true and correct copy of an email communication sent to Class Counsel and Defendants, identified as Class Member A.

9. Attached to this declaration as Exhibit 5 is a true and correct copy of a letter sent to Class Counsel, identified as Class Member B.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on October 13, 2021, in St. Louis, Missouri.

/s/ Troy A. Doles
Troy A. Doles